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**MEMO ENDORSED**

July 14, 2025

**VIA ECF**

Hon. Jessica G. L. Clarke, U.S.D.J.  
United States District Court for the Southern District of New York  
500 Pearl Street, Room 1040  
New York, NY 10007

**Re: *Constrafor, Inc. v. Flagstar Bank, N.A.*,  
Civil Action No. 1:25-cv-4961**

***Constrafor, Inc. v. FDIC*,  
Civil Action No. 1:24-cv-4402**

Dear Judge Clarke:

We represent defendant Flagstar Bank, N.A. ("Flagstar") in the above-referenced matter. Pursuant to Your Honor's Individual Rules and Practices, we respectfully submit this letter request for an extension of time through and including August 14, 2025 to answer, move or otherwise respond to Plaintiff's Complaint. Flagstar's current time to respond to the Complaint runs through July 14, 2025. Flagstar has not made any previous request for an extension of time in this matter.

We require an extension of time in order to adequately review and investigate Plaintiff's claims and Flagstar's defenses. Prior to filing this letter, we contacted Plaintiff's counsel and he consented to the requested extension of time provided that Flagstar agree to waive its personal jurisdictional defenses based on service of process, which Flagstar will do. Plaintiff shall suffer no prejudice by the grant of the requested relief.

Thank you for your Honor's consideration of this matter.

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read "Anthony C. Valenziano".

Anthony C. Valenziano

cc: All Counsel of Record (via ECF)

4937-7730-6197, v. 1

Application GRANTED. Defendant's deadline to respond to Plaintiff's complaint is hereby EXTENDED to August 14, 2025. The Clerk of Court is respectfully directed to terminate ECF No. 10.

SO ORDERED.

A handwritten signature in blue ink, appearing to read "Jessica Clarke".

JESSICA G. L. CLARKE  
United States District Judge  
Dated: July 15, 2025

New York, New York